

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF
MELODY AND ZACHARY
BILLMEYER

DECLARATION OF MELODY AND
ZACHARY BILLMEYER

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 We, Melody Billmeyer and Zachary Billmeyer, declare as follows:

2 1. We are both over the age of 18, competent to testify as to the matters herein, and
3 make this declaration based on our personal knowledge.

4 2. We are making this declaration because on January 7, 2025, our daughter, Kai
5 Billmeyer, who was transgender, took her own life, and we want to do what we can to help other
6 children like Kai. We have included photos of Kai at the end of this declaration.

7 3. We live in Vancouver, Washington with our two dogs and a cat. We have both
8 worked for TSMC Washington, a semiconductor manufacturer, in Camas, Washington for nearly
9 twenty-five years.

10 4. Kai was our only child. Kai was designated male on her birth certificate, but her
11 gender identity was female. Kai was seventeen years old when she died, and was in her last two
12 years of high school. She was energetic, and had a bright and gentle soul. She loved school,
13 began Running Start last year, and was taking college-level courses in Japanese. She loved trying
14 new things and being around people.

15 5. She was incredibly active at her school and in her community. She learned to play
16 instruments at an early age, including violin, piano, guitar, and percussion. She was involved in
17 choir, jazz band, ensemble orchestra, and would perform with a group of students at nursing
18 homes for the residents. She always volunteered to help clean up after band practice, and we
19 would often be the last car in the parking lot picking her up because she had stayed late to help
20 out. She was planning on going to Disney Land with the school band this upcoming year. At
21 school she was in game club, knowledge bowl, and Japanese club. Kai had been talking about
22 visiting Japan for years, and had a vacation there planned for next year. She loved Magic the
23 Gathering, and would play weekly at game shops. She loved to cook, and was often making us
24 new dishes, always taking on new challenges for herself.

1 6. She had many friends, and we found out recently that she was the person who
2 brought her whole friend group together. She did not have a single mean bone in her body, she
3 was always kind to others.

4 7. Kai came out as to us as transgender when she was 14, during summer break in
5 August of 2022. Our immediate reply was that we love and support her. We then started learning
6 everything we could about how to be a supportive parent to a transgender child. We researched
7 all we could find about gender-affirming care, social transition, and anything else we thought we
8 or Kai would need to know.

9 8. Kai initially only came out to us and a few of her closest friends, because she was
10 afraid of how she would be treated and how her peers would react. In January of 2023, Kai
11 started seeing a therapist to help support her in transitioning and understanding her gender
12 identity. We remember the impact was immediately clear, and she became much happier after
13 starting counseling. She would be looking forward to every session. Eventually, with the advice
14 of her doctor, she started taking testosterone blockers, and later hormone replacement therapy.
15 She also started to get non-medical care to transition, including electrolysis to remove hair on
16 her face and vocal training lessons to help her get the voice she wanted. She started growing out
17 her hair, and was gushing with happiness when we took her to get her long hair dyed pink at a
18 salon. We recently went to an anime convention all dressed up as different characters, and we
19 had never seen Kai so happy as when she got to dress and go out in public as a female character.
20 We bought tickets for the following year's convention immediately afterwards.

21 9. Her joy was clear with every new milestone in her transition. She was so happy
22 to get to the next step, to get closer to presenting in a way that was true to herself.

23 10. While we were glad to see how happy transitioning made her, we were also
24 worried for her safety. We know that society can often treat trans people terribly. We were
25 particularly worried about her being mistreated in public, when taking the public bus going to
26 school, or at school from her classmates.


1 11. The day before the presidential election, Kai told us “Tomorrow I get to find out
2 if I’m illegal.” She was scared about proposed policies effecting transgender people and youth
3 from the new administration. After the election, in December, she told us that she wanted us to
4 move to Canada, because she was so fearful of new restrictions on transgender youth after the
5 inauguration. She was worried about losing access to therapy, having to stop taking testosterone
6 blockers and hormones, and not being able to get gender-affirming surgery in the future. If any
7 of those things happened, it would have reversed years of progress for her to live honestly as the
8 person she wanted to be. We tried to reassure her, telling her we would fight for her and that we
9 just need to make it through the next four years.

10 12. On January 7, 2025, Kai took her life at our home. We never thought she was at
11 risk for suicide, and later her therapist confirmed she did not appear to be at particular risk. We
12 think she got overwhelmed by the negativity toward transgender people like her coming from
13 the political arena and the news. We do not follow politics ourselves, but Kai was keeping up
14 with what was happening. We believe that if the election went the other way, our child would
15 still be alive.

16 13. We are so scared for other trans children right now. We have seen firsthand how
17 much gender-affirming care helped Kai, and how much that care helped other trans students at
18 Kai’s school who we know. The change is so obvious, and so many times have we seen a child
19 who is really reserved or withdrawn blossom after beginning their transition. We are terrified
20 that all that will be ripped away from them. So many lives depend on this care not being banned.
21 We do not want what happened to Kai happen to any other children.

22 I declare under penalty of perjury under the laws of the State of Washington and the
23 United States of America that the foregoing is true and correct.
24
25
26

1 DATED this 5th day of February 2025.

2
3 
4 MELODY BILLMEYER
5 Mother of Kai Billmeyer

6 
7 ZACHARY BILLMEYER
8 Father of Kai Billmeyer











